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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

MARIA GARNICA, an individual,  
  
Plaintiff,

v.

INDIAN HARBOR INSURANCE COMPANY;  
DOES I - V, and ROE CORPORATIONS I - V,  
inclusive,

Defendants.

CASE NO.: 2:21-cv-00560-JCM-VCF

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND OPPOSITION  
AND REPLY FILING DEADLINES  
AS IT RELATES TO LOUI DEEDS'S  
MOTION TO COMPEL [ECF NO. 94]**

**(FIRST REQUEST)**

INDIAN HARBOR INSURANCE COMPANY,  
  
Counterclaimant,

v.

MARIA GARNICA,

Counterdefendant.

INDIAN HARBOR INSURANCE COMPANY,  
  
Third-Party Plaintiff,

v.

LOUI DEEDS, an individual, NELLY IRAN, an  
individual, BLUE SHIELD OF CALIFORNIA, a  
California corporation,

Third Party Defendants.

<p>LOUI DEEDS, an Individual,</p> <p>Third-Party Defendant's Counterclaim,</p> <p>v.</p> <p>INDIAN HARBOR INSURANCE COMPANY; DOES I-V, and ROE CORPORATIONS I-V, inclusive</p> <p>Counterdefendants.</p>
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COMES NOW, Non-Party Constitution State Services ("CSS"), by and through its counsel of record, Spencer Fane LLP, and third-party defendant and third-party counterclaimant LOUI DEEDS ("Deeds"), by and through her counsel of record, Leonard H. Stone and Kurt D. Anderson of the law firm of Shook & Stone, Chtd., and hereby submit this Stipulation and [Proposed] Order to Extend Opposition and Reply Filing Deadlines as it Relates to Deeds's Motion to Compel [ECF No. 94] (the "Motion to Compel").

Pursuant to Local Rule IA 6-1(c), the parties state as follows: (1) the current deadline for CSS to file its opposition in response to the Motion to Compel is July 17, 2023; (2) the current deadline for Deeds to file her reply in support of the Motion to Compel is July 24, 2023; and (3) no hearing date has been set with respect to the Motion to Compel. This is the parties' first request to extend the briefing deadlines as it relates to the Motion to Compel.

The parties seek to extend the briefing deadlines by seven (7) days such that the new deadlines would be as follows: (1) the deadline for CCS to file its opposition in response to the Motion to Compel would be July 24, 2023; and (2) the deadline for Deeds to file her reply in support of the Motion to Compel would be July 31, 2023.

The parties request that the following factors be considered by the Court in establishing good cause for the extension of the briefing deadlines:

1. The Motion to Compel was filed on June 30, 2023 [ECF No. 94].
2. CSS is a non-party, and did not receive the Motion to Compel in the mail until July 5, 2023.

3. Undersigned counsel was out of the office for a pre-op visit, surgery and to recover from surgery after the Motion to Compel was received in the mail.
4. Given the above, Deeds' counsel was agreeable to a mutual extension of seven (7) days regarding the parties' respective filing deadlines.
5. No hearing date has been set by the Court for the Motion to Compel and this is the parties' first request for a stipulated extension of the briefing schedule for the Motion to Compel.
6. Accordingly, the parties seek to move the filing deadlines relative to Deeds' Motion to Compel as follows:
  - a. The deadline for CSS to file its Opposition in response to Deeds' Motion to Compel would be moved from July 17, 2023 to July 24, 2023; and
  - b. The deadline for Deeds to file her Reply in support of the Motion to Compel would be moved from July 24, 2023 to July 31, 2023.
7. No further deadlines set by the Court would be affected by the granting of this stipulated extension.

**IT IS SO STIPULATED AND AGREED:**

**SPENCER FANE LLP**

Dated: July 17, 2023

/s/ Mary E. Bacon

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1 Dated: July 17, 2023

**SHOOK & STONE, CHTD.**

3 /s/ Kurt D. Anderson

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Third-Party Counterclaimant Loui Deeds*

**ORDER**

**IT IS SO ORDERED:**



UNITED STATES MAGISTRATE JUDGE

DATED: 7-17-2023